IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF ARKANSAS CENTRAL DIVISION

UNITED STATES OF AMERICA

Plaintiff

v. NO. 4:19-CR-00110-01 BSM

JOSHUA WAYNE HATLEY

Defendant

## **UNOPPOSED MOTION TO CONTINUE**

Defendant moves to continue October 19th trial date (Doc. 33) because the government and defense counsel are earnestly trying to resolve this case without trial. The mechanics will take a little while. Defendant is in custody. He was at the time defense counsel joined this case.

AUSA Edward O. Walker does not oppose this continuance.

This is the first motion to continue from this defense counsel who was just substituted in this July. (Doc. 34–35) We have all the discovery from government and the various versions of this case in state court first.

This tolls speedy trial because it is in the interest of the government, defense, and court to resolve this case without the resources of trial if it can be done so. The ends of justice would thus be served by enabling us to work out the complexities of this and it outweighs the best interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

The parties believe a continuance of 90 days would be sufficient to do this with the view that a Covid continuance won't be required.

Respectfully submitted,

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